

Work Group Agenda & Preparation Suggestions

Permit Coverage & Administrative Issues: Continuity & Accountability

November 13, 2008

10:00 – 3:00 Floyd|Snider Office, Two Union Square, 601 Union Street, Suite 600

The public is welcome to attend the meeting, which Ecology will publicize on its website. After each major agenda item, the public will have a brief period to provide input.

Please bring your own lunch – it is quite time consuming to purchase lunch on the premises.

10:00 Introductions, Meeting Agenda

10:10 ISWGP examples from other states

- Cal follow up from last meeting

10:20 Follow up from 10/17

- Action Levels vs. Benchmarks – are both appropriate in permit?
- Reasonable Potential Analysis re: proposed permit requirements

11:45 Get Lunch and Come Back...

12:00 Enforcement and Incentives

(Remember, December meeting will discuss Assistance to Permittees)

- Enforcement and presence, municipal coordination
- Process for different levels of violations
- Incentives

1:00 Administrative Issues

- Continuity between old and new general permits
- General permit v Individual Permits, what triggers Individual Permit
- Site-specific factors

1:30 Discussion and Identification of Potential Recommendations

2:30 Summary and Next Steps

Work Group Preparation

- Jeff – prep discussion re: “Reasonable Potential Analysis” requirements and methodologies – how it would be done at the Permit level
- Heather – prep discussion re: potential coordination with Municipal inspections

ISSUES IDENTIFIED IN WORK PLAN FOR DISCUSSION AT THIS MEETING**Enforcement and Incentives (scheduled for the 10/17 meeting but not discussed)**

- Enforcement and presence (relates to fees and Ecology staff)
- A problem is that Ecology's process is the same for all violations
 - * Is it preferable to reduce the amount of process and number of transactions?
 - * Can Ecology automate non-compliance responses for clear violations, like the non-submittal of a DMR?
 - * Can Ecology create a better connection between data and action?
- Incentives so compliance is a competitive advantage with environmental results
 - * Provide a voluntary track for businesses?

Permit Coverage & Administrative Issues: Continuity & Accountability

- Who is covered under general permit, who should be under individual permit (due to significance)
 - * High metals – is there a subset that should be individual permits?
- What should trigger individual permit
 - * Water body
 - * Monitoring history and use
- Continuity between old and new general permits
- Historical sources
- Landlord and tenant issues
- Accountability for upgradient run-on
- Comingling
- CSO – exemption from ISWGP?
- Unpermitted discharges

Upcoming Meeting Dates, Times, Locations, and Topics

December 12, 2008 – 10:00am to 3:00pm

Assistance to Permittees (Implementation Support Structure)

Port of Seattle, Pier 69, Seattle

January 15, 2009 – 10:00am to 3:00pm

Compilation of Recommendations

Weyerhaeuser Technology Center, Federal Way

January 22, 2009 – 10:00am to 3:00pm

Compilation of Recommendations, Wrap Up

Port of Seattle, Pier 69, Seattle